

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

THE PORTLAND MINT,)	
)	
Plaintiff,)	
)	
v.)	No. 20-518C
)	(Judge Horn)
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	
)	

PLAINTIFF’S UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO FILE STATUS REPORT
PURSUANT TO THE COURT’S APRIL 9, 2021 ORDER

Pursuant to Rule 6(b) of the Rules of the United States Court of Federal Claims, plaintiff, The Portland Mint (“TPM”), respectfully requests a two-day enlargement of time, to and including April 30, 2021, within which to file the status report prescribed by the Court’s Order dated April 9, 2021. (ECF Doc. 43). TPM’s status report is currently due on April 28, 2021. This is TPM’s first request for an enlargement of time for this purpose. Counsel for defendant has indicated that it does not oppose this motion.

Good cause exists to grant this request. TPM seeks the enlargement of time so the issues set forth in the Court’s April 9, 2021 Order can be adequately addressed. Specifically, the Court requested TPM to provide a thorough examination and analysis on: a potential Administrative Procedure Act claim in district court; this Court’s jurisdiction over each claim in the Amended Complaint; which counts should be retained if this matter is transferred in part to a district court; and various federal statutes. The short, two-day enlargement is necessary for TPM to address all of these issues.

For these reasons, TPM respectfully requests that the Court grant this unopposed motion for an enlargement of time of two days, to and including April 30, 2021, within which to file its status report.

Dated: April 30, 2021

Respectfully submitted,

/s/ Lee Vartan

LEE VARTAN

Chiesa Shahinian & Giantomasi PC

ONE BOLAND DRIVE

WEST ORANGE, NJ 07052

T: 973.325.1500

F: 973.325.1501

lvartan@csglaw.com

Attorneys for Plaintiff The Portland Mint

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of April, 2021, a copy of the foregoing “PLAINTIFF’S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE STATUS REPORT PURSUANT TO COURT’S APRIL 9, 2021 ORDER” was filed electronically. I understand that notice of this filing will be sent to all parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system. Additionally, service was made upon the following via electronic mail:

Alison S. Vicks, Esq.
Trial Attorney
Commercial Litigation Branch
Civil Division Department of Justice
P.O. Box 480
Ben Franklin Station
Washington, D.C. 20044
Attorneys for Defendant

/s/ Lee Vartan
LEE VARTAN